

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
:  
UNITED STATES OF AMERICA : INDICTMENT  
:  
- v. - : 22 Cr.  
:  
JESSE GIBSON, :  
:  
Defendant. :  
- - - - - X

22 CRIM 195

COUNT ONE

(Firearms Trafficking)

The Grand Jury charges:

1. From at least in or about November 2021 up to and including in or about March 2022, in the Southern District of New York and elsewhere, JESSE GIBSON, the defendant, not being a licensed importer, licensed manufacturer, and licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully and knowingly engage in the business of dealing in firearms, and in the course of such business did ship, transport, and receive firearms in interstate and foreign commerce, to wit, the defendant illegally sold firearms in the vicinity of Manhattan, New York.

(Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1), and 2.)

COUNT TWO

(Felon in Possession of a Firearm)

The Grand Jury further charges:

2. On or about November 8, 2021, in the Southern District of New York, JESSE GIBSON, the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit, a .22 caliber Ruger rifle, and the firearm was in and affecting commerce.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.)

COUNT THREE

(Felon in Possession of a Firearm)

The Grand Jury further charges:

3. On or about November 22, 2021, in the Southern District of New York, JESSE GIBSON, the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit, a 9mm, Springfield Armory XDS pistol, and the firearm was in and affecting commerce.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.)

**FORFEITURE ALLEGATION**

4. As a result of committing the offense alleged in Count One of this Indictment, JESSE GIBSON, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Assets Provision**

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

Jim Cawley  
FOREPERSON

Damian Williams/s  
DAMIAN WILLIAMS  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

JESSE GIBSON,

Defendant.

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INDICTMENT

22 Cr.

(18 U.S.C. §§ 922(a)(1)(A), 922(g)(1),  
924(a)(1), 924(a)(2), and 2.)

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DAMIAN WILLIAMS  
United States Attorney

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Damian L. Williams  
Foreperson

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NE  
3/29/22

Indictment filed

Sarah L. Cave  
U.S.M.J.

Case assigned to  
~~Judge~~ Judge Ward  
wheel A